REMARKS

Claims 1-23 are pending in the present application, with claims 1, 17 and 22 being the independent claims. In the Official Action, dated Sept. 12, 2005, claims 5, 6, 11-16 and 22 were rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Claims 1-23 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by U.S. Patent No. 6,839,680 (Liu). The outstanding rejections to the claims under 35 U.S.C. § 112 and § 102 are respectfully traversed.

Formal Matters

In consideration of the rejection under 35 U.S.C. § 112, the claims (1, 2, 5-7, 10-12, 14, 17-19 and 22) have been amended herein to clarify for matters of antecedent basis that were unclear upon filing. No new matter has been added. Reconsideration and withdrawal of the rejection under 35 U.S.C. § 112 is thus respectfully requested.

Summary of the Invention

At the time of Applicant's invention, the delivery of relevant online content was facing significant challenges. On the one hand, content service providers are constantly developing and offering new services and features to distinguish themselves from each other in an effort to attract and/or retain customers.

In the past, for instance, a participating user may input a search on the Philadelphia 76ers in an effort to learn more about a recent player trade. A content service provider using then existing psycho-graphic profiling could monitor the participating user's content usage behavior to determine that the user has a preference for the 76ers NBA® franchise. Using this preference information, the content service provider could then

aggregate additional content (e.g., 76er's merchandise offerings, news stories about the 76ers, etc.) and offer the additional content to the participating user. Accordingly, profiling allowed content service providers the ability to offer additional relevant content to participating users.

In the e-commerce context, however, most often e-consumers do not receive information that truly matters to them during their e-shopping experience. Online content is generally categorized in "content verticals" – or more accurately, is aligned around a single, or a set of specific subject matter areas. Using the example above, content service providers using current profiling practices may only offer basketball related content in response to the user's 76ers search. Such practice has significant drawbacks as the user experience becomes too focused not availing or accounting for the user's preferences *in totem*. Current practices were thus lacking as they tend to offer content relating to a single or, alternatively, a set of specific subject matter areas, disregarding and not accounting for a user's total preferences.

In consideration of a better system, the invention delivers concentric user-targeted content to a participating user. In one embodiment, the concentric user-targeted content delivery system comprises a user profile data store, user content usage data store, and an affinity/preference algorithm. In operation, the concentric user-targeted delivery system cooperates with a user profile data store and user usage data store to obtain data indicative of a user's current content usage and a user's profile (e.g., demographic information, preference information, etc.). The usage and profile data are processed by the concentric user-targeted content delivery system to establish a baseline of user preferences. Using the preference information, the concentric user-targeted delivery system executes at least one matching algorithm to aggregate from the content data store a range of additional content offerings that

correlate to the user profile and usage behavior. In one embodiment, the additional content offerings range is categorized into micro, mezzo, and macro-related content offerings.

Rejection under 35 U.S.C. § 102

Claims 1-23 were rejected under 35 U.S.C. § 102(e) as allegedly anticipated by Liu.

In the Official Action, Col. 59, line 48 to Col. 60, lines 1-13 are used as support for a teaching or suggestion of the claimed "content data store having various content for display to participating users." The cited passage, however, is merely understood to describe a method for interested clients on a network to subscribe to visitor data.

For a similar reason, Fig. 6 does not teach or suggest "at least one instruction set cooperating with one or more data stores and content data store," because Applicant understands Col. 59, line 48 to Col. 60, lines 13 to merely disclose that client with PROREACH software 108 subscribes to visitor data via global upload software of the PROREACH global services 112. Applicant sees no disclosure of a content data store having various content for display to participating users in Fig. 6.

Still further, Col. 63, line 32 to Col. 64, line 20 is alleged to teach or suggest "wherein said at least one instruction set operates on data from said one or more data stores and content data store." However, the passage cited in the Official Action merely discusses filtering home page visits out of visitor data, filtering based on *user-supplied* privacy filters including keyword based privacy filters.

Accordingly, the passages of Liu cited in the Official Action are not understood to teach or suggest Applicant's invention, as recited in claim 1. Claims 17 and 22

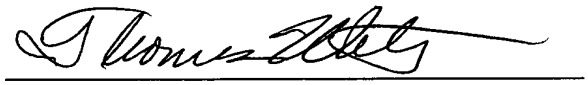
include similar recitations as claim 1 and are believed allowable for the same reasons. Claims 2-16, 18-21 and 23 depend from claims 1, 17 and 22, respectively, and are believed allowable for the same reasons.

Applicant thus submits that claims 1-23 patentably defines over Liu. Reconsideration and withdrawal of the rejection to claims 1-23 under 35 U.S.C. § 102(e) is thus earnestly solicited.

CONCLUSION

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Office Action, and submits that claims 1-23 of the application are in condition for allowance. Favorable consideration and passage to issue of the application at the Examiner's earliest convenience is earnestly solicited.

Date: December 5, 2005



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